

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED:** \_\_\_\_\_

**MARCUS WHITE** : **VIOLATIONS:**  
: **18 U.S.C. § 2114 (a) (robbery of a postal**  
: **employee - 1 count)**  
: **18 U.S.C. § 1951 (robbery which**  
: **interferes with interstate commerce - 2**  
: **counts)**  
: **18 U.S.C. § 924(c) (using and carrying a**  
: **firearm during a crime of violence - 3**  
: **counts)**  
: **18 U.S.C. § 922(g)(1) (possession of a**  
: **firearm by a convicted felon - 2 counts**  
**Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about May 27, 2010, in Limerick, in the Eastern District of Pennsylvania,  
defendant

**MARCUS WHITE**

knowingly and intentionally robbed a United States Postal Service employee of the Limerick Post Office, 327 West Ridge Pike, who had lawful charge, control, and custody of money of the United States, that is, cash and a box containing a large number of unissued U.S. Postal Money Orders, including one with serial number 16843365977.

In violation of Title 18, United States Code, Section 2114(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 27, 2010, in Limerick, in the Eastern District of Pennsylvania,  
defendant

**MARCUS WHITE**

knowingly used and carried a firearm, that is, a .357 Ruger revolver, Model Security 6, with a 5  
½ inch barrel and stainless steel finish, serial number 153-07019, during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States, that is, robbery  
of a postal employee, in violation of Title 18, United States Code, Section 2114(a).

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Turkey Hill was a chain of more than 240 convenience stores engaged in the retail sale of food and beverages in interstate commerce in Pennsylvania, Indiana, and Ohio, and was an enterprise which affected interstate commerce. Two of the Turkey Hill stores located in the Eastern District of Pennsylvania were at 1000 West Kings Highway in Coatesville, Pennsylvania (“the Coatesville Turkey Hill”) and 3051 East High Street in Lower Pottsgrove Township, Pennsylvania (“the Lower Pottsgrove Turkey Hill”).

2. On or about June 1, 2010, at the Coatesville Turkey Hill, in the Eastern District of Pennsylvania, defendant

**MARCUS WHITE**

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant WHITE unlawfully attempted to unlawfully take and obtain, money, unissued Turkey Hill Western Union money orders, and other items of value from an employee against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property in his possession, that is, by brandishing and pointing a firearm at an employee of the Coatesville Turkey Hill.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 1, 2010, in Coatesville, in the Eastern District of Pennsylvania,  
defendant

**MARCUS WHITE**

knowingly used and carried a firearm, that is, a .357 Ruger revolver, Model Security 6, with a 5  
½ inch barrel and stainless steel finish, serial number 153-07019, during and in relation to a  
crime of violence for which he may be prosecuted in a court of the United States, that is, robbery  
which interferes with interstate commerce, in violation of Title 18, United States Code, Section  
1951.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1 of Count Three of this indictment is incorporated here.
2. On or about June 1, 2010, at the Lower Pottsgrove Turkey Hill, in Lower Pottsgrove Township, in the Eastern District of Pennsylvania, defendant

**MARCUS WHITE**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and conspired to do so, by robbery, in that, defendant WHITE unlawfully took and obtained United States currency and approximately 65 unissued Turkey Hill Western Union money orders, serial numbers 14-027447534 through 14-027447599, cigarette lighters, and other items of value from an employee against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property in his possession, that is, by brandishing and pointing a firearm at, and shooting, an employee of the Lower Pottsgrove Turkey Hill.

All in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 1, 2010, in Lower Pottsgrove Township, in the Eastern District of Pennsylvania, defendant

**MARCUS WHITE**

knowingly used and carried a firearm, that is, a loaded .357 Ruger revolver, Model Security 6, with a 5 ½ inch barrel and stainless steel finish, serial number 153-07019, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 27, 2010 , at Limerick, in the Eastern District of Pennsylvania,  
defendant

**MARCUS WHITE**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a .357 Ruger revolver, Model Security 6, with a 5 ½ inch barrel and stainless steel finish, serial number 153-07019.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 1, 2010, in Coatesville and Lower Pottsgrove Township, in the Eastern District of Pennsylvania, defendant

**MARCUS WHITE,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a .357 Ruger revolver, Model Security 6, with a 5 ½ inch barrel and stainless steel finish, serial number 153-07019.

In violation of Title 18, United States Code, Section 922(g)(1).



**NOTICE OF FORFEITURE**

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendant

**MARCUS WHITE**

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of such offenses, including, but not limited to:

- (1) one a .357 Ruger revolver, Model Security 6, with a 5 ½" barrel and stainless steel finish, serial number 153-07019; and
- (2) six live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
**United States Attorney**